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Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ALEXANDRA LOYOLA,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:25-cv-01550-CKD

STIPULATION AND ORDER FOR
EXTENSION OF TIME

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 50 days, from December 8, 2025 to January 27, 2026, for the Commissioner to file his Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

This is the Commissioner's first request for an extension of time for his Cross-Motion. Plaintiff does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to staffing reductions, organizational changes, and the recent lapse in appropriations for federal agencies including the Social Security Administration, the

undersigned counsel for the Commissioner has many pressing deadlines from the resulting backlog of cases requiring reassignment, extension, and briefing, including the instant case, which was just reassigned to her. Additionally, the undersigned is scheduled to be out of the office on leave during the first week of December and for two days at the end of the month. Despite diligent efforts to manage her workload, counsel for the Commissioner needs additional time in the instant case to review the substantial administrative record, consider the issues that Plaintiff has raised, confer with her client as necessary, and prepare the Commissioner's Cross-Motion.

Respectfully submitted,

Dated: November 24, 2025

JESSE S. KAPLAN, ATTORNEY AT LAW

By: /s/ Jesse S. Kaplan*

JESSE S. KAPLAN

Attorneys for Plaintiff

[*As authorized by email on Nov. 24, 2025]

Dated: November 25, 2025

ERIC GRANT

United States Attorney

MATHEW W. PILE

Head of Program Litigation 1

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By: /s/ Margaret Branick-Abilla

MARGARET BRANICK-ABILLA

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS ORDERED that the Commissioner's Cross-Motion for Summary Judgment shall be due on January 27, 2026 and Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

Dated: November 25, 2025



CAROLYN K. DELANEY

UNITED STATES MAGISTRATE JUDGE